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**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE BOARD OF PATENT APPEALS AND INTERFERENCES**

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| In re Application of | : | Customer Number: 46320 |
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| Barnaby COURT, et al. | : | Confirmation Number: 6010 |
| | : | |
| Application No.: 10/675,487 | : | Group Art Unit: 2174 |
| | : | |
| Filed: September 30, 2003 | : | Examiner: C. Watt |
| | : | |
| For: COMPLEX TABLE RENDERING AND NAVIGATION WITHIN CONSTRAINED DEVICES | : | |

APPEAL BRIEF

Mail Stop Appeal Brief - Patents
Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

Sir:

This Appeal Brief is submitted in support of the Notice of Appeal filed May 7, 2007, wherein Appellants appeal from the Examiner's rejection of claims 1-12.

I. REAL PARTY IN INTEREST

This application is assigned to IBM Corporation by assignment recorded on September 30, 2003, at Reel 014573, Frame 0011.

II. RELATED APPEALS AND INTERFERENCES

Appellants are unaware of any related appeals and interferences.

III. STATUS OF CLAIMS

Claims 1-12 are pending and finally rejected in this Application. It is from the final rejection of claims 1-12 that this Appeal is taken.

IV. STATUS OF AMENDMENTS

The claims have not been amended subsequent to the imposition of the Second Office Action dated February 7, 2007 (hereinafter the Second Office Action).

V. SUMMARY OF CLAIMED SUBJECT MATTER

Referring to Figures 1 and 3A-3D and also to independent claim 1, a complex table rendering and navigation system is disclosed. A plurality of row range views is illustrated in Figure 3A, a plurality of row views is illustrated in Figure 3B, and a plurality of record views is illustrated in Figure 3C (page 9, lines 8-15 of Appellants' disclosure). Each of the row views have an association with one of the row range views; and each of the record views have an association with one of the row views (page 9, lines 16-21). A complex table processor 120 is coupled to an application server 110 and programmed to reduce a complex table 150 into the row range views, the row views and the record views (page 7, line 22 through page 8, line 3). A controller maps selected events and triggers originating within the views to others of the views and maps additional selected events and triggers originating within the views to the complex table 150 (page 8, lines 5-11)

Referring to Figure 2 and also to independent claims 3 and 8, a method of enabling complex table navigation in a highly constrained device is disclosed. In 220, a complex table defined in markup is reduced to a row range view, a set of row views and a set of record views

(page 8, lines 20-23). In 240, individual ones of the record views are navigably linked to selected ones of the row views, and individual ones of the row views are navigably linked to selected row ranges disposed in the row range view (page 8, line 23 through page 9, line 4). In 260 and in Figure 3A, the row range view is presented responsive to a request to render the complex table in the highly constrained device (page 9, lines 5-15).

Referring to Figures 3A-3C and also to independent claims 7 and 12, a method of enabling complex table navigation in a highly constrained device is disclosed. In steps 210, 220, a complex table defined by intent based markup is parsed, and a reduced view of the complex table is produced, the reduced view comprising a selection of row ranges defining ranges of rows in the complex table, and rendering the reduced view in the highly constrained device (Figure 3A; page 9, lines 9-15). Responsive to a selection of one of the ranges of rows, a further reduced view of the complex table is produced, and the further reduced view comprising a selection of rows in the selected one of the ranges of rows, and the further reduced view is rendered in the highly constrained device in lieu of the reduced view (Figure 3B; page 9, lines 13-18). Responsive to a selection of one of the rows, a further reduced view of the complex table is produced, which comprises a record associated with the selected one of the rows, and the further reduced view is rendered in the highly constrained device (Figure 3C; page 9, lines 18-21).

VI. GROUNDS OF REJECTION TO BE REVIEWED ON APPEAL

1. Claims 1-12 are rejected under 35 U.S.C. § 103 for obviousness based upon Polonsky et al., U.S. Patent No. 7,072,984 (hereinafter Polonsky, in view of Bickmore et al., U.S. Patent No. 6,857,102 (hereinafter Bickmore), and Leduc, U.S. Patent No. 6,675,351.

VII. ARGUMENT

THE REJECTION OF CLAIMS 1-12 UNDER 35 U.S.C. § 103 FOR OBVIOUSNESS BASED UPON POLONSKY IN VIEW OF BICKMORE AND LEDUC

For convenience of the Honorable Board in addressing the rejections, claims 2-12 stand or fall together with independent claim 1.

In the First Office Action dated August 15, 2006 (hereinafter the First Office Action), the Examiner rejected claims 1-12 under 35 U.S.C. § 103 for anticipation based upon Polonsky. Upon reviewing the Examiner's newly asserted rejection based upon the combination of Polonsky, Bickmore, and Leduc, Appellants note that (i) the Examiner did not address all of Appellants' prior arguments with regard to Polonsky and (ii) the Examiner's secondary references do not teach all of the limitations for which the Examiner is relying upon these references to teach.

Claim 1

On pages 2 and 3 of the First Response dated November 15, 2006 (hereinafter the First Response), Appellants presented the following arguments. Independent claim 1 recites, in part, "a plurality of row range views, a plurality of row views, each of said row views having an association with one of said row range views." To teach the plurality of row range views, the Examiner asserted that column 19, lines 10-14 of Polonsky identically discloses these features. Appellants respectfully disagree with the Examiner's assertion.

Column 19, lines 10-14 refers to the template normalizer 84 in Fig. 2 of Polonsky. As described therein, the template normalizer 84 takes documents and normalizes the documents. The specific discussion found in column 19, lines 10-14 describes that the template normalizer 84 is capable of dealing with different documents, regardless of whether or not the documents includes a data table having a various number of columns and rows or no data table at all. This passage, however, is completely silent as to a plurality of row range views. The Examiner's statement of the rejection does not construe a meaning for row range views or establish how Polonsky teaches a plurality of row range views. Despite these arguments, in the Second Office Action, the Examiner still relies upon column 19, lines 10-14 (see line 3 on page 3) to teach the "row range reviews." Thus, the Second Office Action fails to address these arguments.

In the last full paragraph on page 3 of the First Response, Appellants presented the following remarks. Regarding the claimed "a plurality of row views, each of said row views having an association with one of said row range views " the Examiner cited column 21, lines 63-67 of Polonsky. Although Appellants recognize that Fig. 12 of Polonsky shows the broad concept of rows, the Examiner has failed to establish that the teachings in Polonsky cited by the Examiner have any relationship with the asserted "row range views." As recited in claim 1, these row views have an association with "one of said row range views." Not only has the Examiner failed to establish that the alleged row views in Fig. 12 have an association with one of the alleged row range views (i.e., the disclosure in column 19, lines 10-14 of Polonsky), the Examiner has failed to establish the alleged row views in Fig. 12 have any association with the alleged row range views. Thus, the Examiner has failed to establish that Polonsky identically

discloses the entirety of this limitation. In the Second Office Action, the Examiner relied upon the secondary reference of Bickmore to allegedly teach these limitations.

In the first full paragraph on page 4 of the First Response, Appellants presented the following remarks. Claim 1 further recites "a plurality of record views, each of said record views having an association with one of said row views," for which the Examiner cited column 22, lines 56-57 of Polonsky to identically disclose. A review of this passage, however, yields no such teaching. The Examiner has failed to establish that the code disclosed in column 22, lines 56-57 constitutes "a plurality of record views" given the ordinary and customary meaning attributed to the term "view" by one having ordinary skill in the art. Moreover, the Examiner has failed to establish that these alleged "record views" have an association with one of the alleged row views (i.e., column 21, lines 63-67). Despite these arguments, in the Second Office Action, the Examiner still relies upon column 22, lines 56-57 (see line 5 on page 3) to teach the "the plurality of record view." Thus, the Second Office Action further fails to address these arguments.

In the last full paragraph on page 4 of the First Response, Appellants presented the following remarks. Claim 1 recites "a complex table processor coupled to an application server and programmed to reduce a complex table into said row range views, said row views and said record views," and the Examiner cited column 21, lines 46-60 to teach the claimed complex table processor. However, this passage is silent with regard to reducing the complex table into the row range views, the row view, and the record views. Polonsky does not teach reducing the complex table in row range views. Instead Polonsky teaches using "[t]able pattern recognition" to look

for tables "that conform to some of the more common uses of the tables for data presentation." This pattern recognition uses "weighting and comparison of table cell nodes ... to determine the order in which to extract cell data." The table is then normalized as described throughout Polonsky. As such, Polonsky further fails to identically disclose the claimed invention. Despite these arguments, in the Second Office Action, the Examiner still relies upon column 21, lines 46-60 (see line 1-2 on page 3) to teach reducing the complex table. Thus, the Second Office Action still further fails to address these arguments.

The Examiner's Obviousness Analysis

On page 3 of the Second Office Action, the Examiner admitted the following as to what Polonsky fails to teach:

Polonsky does not teach presentation or selection of row or row range views, an association or linking between row views and row range views, or between record views and row views.

In the paragraph spanning pages 3 and 4 of the Second Office Action, the Examiner cited several passages in Bickmore, the importance of which were not clearly explained. The Examiner then concluded on the bottom of page 4 the following:

It would have been obvious to an artisan at the time of the invention to combine the row views of Bickmore with the complex table display of Polonsky to provide "formatting information that defines the layout of the text strings, images, tables and links within the web page" (col. 6 lines 27-29 of Bickmore).

For ease of reference, column 6, lines 18-29 of Bickmore is reproduced below:

In the following discussion of the document re-authoring and document filtering systems and methods of this invention, the terms "web page", "web document" and "document" are intended to encompass any set of information retrieved as a single entity from a distributed network, such as an intranet, the Internet, the World Wide Web portion of the Internet or any other known or later developed distributed network. This information can include text strings, images, tables of text strings and images, links to other web pages and formatting information that defines the layout of the text strings, images, tables and links within the web page. (emphasis added)

The underlined portion from the above-cited passage is the Examiner's alleged benefit for the proposed combination. As apparent from reading this passage, this "alleged benefit" merely describes the type of information that can be retrieved as a single entity from a distributed network, as described Bickmore. Absent from this passage, however, is a nexus between the Examiner's alleged benefit and the proposed modification to Polonsky based upon the teachings of Bickmore. The need for a nexus between the proposed modification and the asserted benefit of the modification is to establish that one having ordinary skill in the art would have been realistically impelled to modify the prior art in the manner suggested by the Examiner. Neither this passage nor the Examiner has explained why one having ordinary skill in the art would enjoy a reasonable expectation of achieving this particular asserted benefit based upon the Examiner's proposed modification of Polonsky in view of Bickmore.

On page 4 of the Second Office Action, the Examiner admitted the following as to what Bickmore fails to teach "Bickmore does not teach range row views associated with or linked to record and row views." The Examiner then asserted the following in the paragraph spanning pages 4 and 5 of the Second Office Action:

Leduc teaches range row views (i.e. col. 7 lines 14-19 of Leduc: "the row index loop control variable is tested to make it is within range ... If the index is out of range row index is obtained"). It would have been obvious to an artisan at the time of the invention to combine the row range views of Leduc with the row views of Bickmore and complex table display of Polonsky so that "if the table has been parsed into a list or tree of objects, according to the Document Object Model, then the method may traverse the list or tree to count the number of rows and columns in the table." (col. 4 lines 34-37 of Leduc).

For ease of reference, the two passages in Leduc cited by the Examiner are reproduced below:

For example if the table has been parsed into a list or tree of objects, according to the Document Object Model, then the method may traverse the list or tree to count the number of rows and columns in the table. (column 4, lines 34-37)
In step 642 the row index loop control variable is tested to make it is within range. If the index is out of range, then all the cells of the current column have been processed, and the execution

illustrated in FIG. 3 completes. Otherwise, in step 644 the cell referenced by the current column index and row index is obtained. (column 7, lines 14-19)

Neither of these passages refers to the claimed "a plurality of row range views ... each of said row views having an association with one of said row range views." Specifically, completely absent from these teachings is a discussion of row range views. Moreover, as with the Examiner's analysis regarding Bickmore, the Examiner has failed to establish a nexus between the proposed modification (i.e., row range views and associated limitations) and the asserted benefit (i.e., "if the table has been parsed ...").

Therefore, for the reasons stated above, Appellants respectfully submit that the Examiner has failed to establish a prima facie case of obviousness in rejecting claim 1 under 35 U.S.C. § 103 for obviousness based upon Polonsky in view of Bickmore and Leduc.

Claims 3, 7-8, and 12

Each of independent claims 3, 7-8, and 12 include the concepts of ranges of rows, and as already argued above, the Examiner has failed to establish that Polonsky, either alone or in combination with Bickmore and Leduc, discloses this feature.

Conclusion

Based upon the foregoing, Appellants respectfully submit that the Examiner's rejection under 35 U.S.C. § 103 is not viable. Appellants, therefore, respectfully solicit the Honorable Board to reverse the Examiner's rejection under 35 U.S.C. § 103.

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To the extent necessary, a petition for an extension of time under 37 C.F.R. § 1.136 is hereby made. Please charge any shortage in fees due under 37 C.F.R. §§ 1.17, 41.20, and in connection with the filing of this paper, including extension of time fees, to Deposit Account 09-0461, and please credit any excess fees to such deposit account.

Date: July 9, 2007

Respectfully submitted,

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CUSTOMER NUMBER 46320

VIII. CLAIMS APPENDIX

1. A complex table rendering and navigation system comprising:

a plurality of row range views, a plurality of row views, each of said row views having an association with one of said row range views; and

a plurality of record views, each of said record views having an association with one of said row views;

a complex table processor coupled to an application server and programmed to reduce a complex table into said row range views, said row views and said record views; and,

a controller configured to map selected events and triggers originating within said views to others of said views, and to map additional selected events and triggers originating within said views to said complex table.

2. The system of claim 1, further comprising a filter management view.

3. A method of enabling complex table navigation in a highly constrained device, the method comprising the steps of:

reducing a complex table defined in markup to a row range view, a set of row views and a set of record views;

navigably linking individual ones of said record views to selected ones of said row views, and further navigably linking individual ones of said row views to selected row ranges disposed in said row range view; and,

presenting said row range view responsive to a request to render said complex table in the highly constrained device.

4. The method of claim 3, further comprising the step of selecting and deselecting individual records in said record views.

5. The method of claim 3, further comprising the steps of:
establishing a set of filter criteria for selecting individual records linked to said row views;
filtering a display of said row views based upon said filter criteria; and,
rendering said filtered display in the highly constrained device.

6. The method of claim 3, further comprising the steps of:
receiving a plurality of events generated in said views; and,
handling selected ones of said events without knowledge of an application producing said complex table where said selected ones of said events map to said views and not to said complex table.

7. A method of enabling complex table navigation in a highly constrained device, the method comprising the steps of:
parsing a complex table defined by intent based markup;

producing a reduced view of said complex table, said reduced view comprising a selection of row ranges defining ranges of rows in said complex table, and rendering said reduced view in the highly constrained device;

responsive to a selection of one of said ranges of rows, further producing a further reduced view of said complex table, said further reduced view comprising a selection of rows in said selected one of said ranges of rows, and rendering said further reduced view in the highly constrained device in lieu of said reduced view; and,

responsive to a selection of one of said rows, yet further producing a yet further reduced view of said complex table, said yet further reduced view comprising a record associated with said selected one of said rows, and rendering said yet further reduced view in the highly constrained device in lieu of said further reduced view.

8. A machine readable storage having stored thereon a computer program for enabling complex table navigation in a highly constrained device, the computer program comprising a routine set of instructions for causing the machine to perform the steps of:

reducing a complex table defined in markup to a row range view, a set of row views and a set of record views;

navigably linking individual ones of said record views to selected ones of said row views, and further navigably linking individual ones of said row views to selected row ranges disposed in said row range view; and,

presenting said row range view responsive to a request to render said complex table in the highly constrained device.

9. The machine readable storage of claim 8, further comprising the step of selecting and deselecting individual records in said record views.

10. The machine readable storage of claim 8, further comprising the steps of:
establishing a set of filter criteria for selecting individual records linked to said row views;

filtering a display of said row views based upon said filter criteria; and,
rendering said filtered display in the highly constrained device.

11. The machine readable storage of claim 8, further comprising the steps of:
receiving a plurality of events generated in said views; and,
handling selected ones of said events without knowledge of an application producing said complex table where said selected ones of said events map to said views and not to said complex table.

12. A machine readable storage having stored thereon a computer program for enabling complex table navigation in a highly constrained device, the computer program comprising a routine set of instructions for causing the machine to perform the steps of:

parsing a complex table defined by intent based markup;
producing a reduced view of said complex table, said reduced view comprising a selection of row ranges defining ranges of rows in said complex table, and rendering said reduced view in the highly constrained device;

responsive to a selection of one of said ranges of rows, further producing a further reduced view of said complex table, said further reduced view comprising a selection of rows in said selected one of said ranges of rows, and rendering said further reduced view in the highly constrained device in lieu of said reduced view; and,

responsive to a selection of one of said rows, yet further producing a yet further reduced view of said complex table, said yet further reduced view comprising a record associated with said selected one of said rows, and rendering said yet further reduced view in the highly constrained device in lieu of said further reduced view.

IX. EVIDENCE APPENDIX

No evidence submitted pursuant to 37 C.F.R. §§ 1.130, 1.131, or 1.132 of this title or of any other evidence entered by the Examiner has been relied upon by Appellants in this Appeal, and thus no evidence is attached hereto.

X. RELATED PROCEEDINGS APPENDIX

Since Appellants are unaware of any related appeals and interferences, no decision rendered by a court or the Board is attached hereto.